

**UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
NEW JERSEY**

CHRISTINE CONFORTI, ARATI KREIBICH,
MICO LUCIDE, JOSEPH MARCHICA,
KEVIN MCMILLAN, ZINOVIA SPEZAKIS,
and NEW JERSEY WORKING FAMILIES
ALLIANCE, INC.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in her
official capacity as Monmouth County Clerk,
SCOTT M. COLABELLA, in his official
capacity as Ocean County Clerk, PAULA
SOLLAMI COVELLO, in her official capacity
as Mercer County Clerk, JOHN S. HOGAN, in
his official capacity as Bergen County Clerk,
EDWARD P. MCGETTIGAN, in his official
capacity as Atlantic County Clerk,

Defendants

Case No. 3:20-CV-08267-FLW

Civil Action

NOTICE OF MOTION
TO INTERVENE PURSUANT
TO
F.R.C.P. 24 AND IN THE
ALTERNATIVE TO SUBMIT A
BRIEF AS AMICUS CURIAE
PURSUANT TO *F.R.C.P. 29*

TO ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on a time and date to be assigned by the Court, the undersigned, attorney for Proposed Intervenor the Honorable James Hogan, the Gloucester County Clerk, shall move for an Order of the Court before the Honorable Freda L. Wolfson, Chief Judge of the District Court Judge, of the United States District Court of New Jersey, at the Clarkson S. Fisher Building and U.S. Courthouse, located at 402 East State Street, Room 2020, Trenton, New Jersey 08608, for an Order of the Court permitting the Honorable James Hogan, the Gloucester County Clerk to

intervene in the above referenced matter pursuant to *F.R.C.P.* 24(b)(1)(B) in opposition to Plaintiffs' requested relief or in the alternative, should the Proposed Intervenor's initial requested relief be denied, for permission to submit a brief as *amicus curiae* in the above matter pursuant to *F.R.C.P.* 29.

In support thereof, Proposed Intervenor Honorable James Hogan, the Gloucester County Clerk intends to rely upon the Letter Brief enclosed herewith. Oral argument is not requested unless this matter is opposed. All appearing parties have consented to this application. Further, a Proposed Form of Order is enclosed with this submission.

I certify that on this day, this Notice of Motion, proposed Order and supporting documents submitted on behalf of Movant and electronically filed with the Clerk of the Court will be served upon all counsel of record by electronic notice and e-mail.

Date: March 29, 2021

By: /JMC/
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